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January 26, 2006

VIA HAND DELIVERY

Charles L. A. Terreni, Esquire Chief Clerk and Administrator Public Service Commission of South Carolina Synergy Business Park 101 Executive Center Dr., Suite 100 Columbia, SC 29210

RE: Application of Palmetto Utility Protection Service, Incorporated for

Assignment of the 811 Abbreviated Dialing Code to be Implemented

in South Carolina

Docket No. 2005-390-C

Dear Mr. Terreni:

Enclosed are the original and ten (10) copies of United's Petition to Intervene Out of Time in the above-named docket. By copy of this letter, I am serving all parties of record.

I have enclosed an extra copy of this petition which I would ask you to date stamp and return to me via my courier. If you have questions, please do not hesitate to contact me.

Sincerely,

Elliott & Elliott, P.A.

SERVICE OR FOR

JAN 2 6 2006

Scott Elliott

PSC SC DOCKETING DEPT.

SE/mlw

Enclosures

c: All Parties of Record w/enc.

BEFORE

THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

Docket No. 2005-390-C

PETITION TO OUT OF

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In the matter of:

Application of Palmetto Utility

Protection Service, Incorporated for
Assignment of the 811 Abbreviated

Dialing Code to be Implemented in

South Carolina

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In response to the Commission's Notice of the filing of the Application of Palmetto Utility Protection Services Requesting 811 Implementation, United Telephone Company of the Carolinas ("United") submits the within Petition to Intervene Out of Time in this proceeding. In support of its Petition United respectfully shows this honorable Commission the following:

- 1. United is a local exchange telephone company organized and doing business under the laws of the State of South Carolina. United is subject to the jurisdiction of this Commission.
- 2. United seeks to intervene in this proceeding with full rights to participate as a party of record insofar as its interests might appear.
- 3. United currently uses 811 for internal company purposes, and as a result this docket has a direct and immediate impact on the operations of United. Therefore, United has an interest in this proceeding. Having been served with discovery by one of the parties, United's interests in this matter are even further implicated.
- 4. United believes that its participation in this docket is necessary to protect its interests and to provide the Commission with additional input on how the Application will affect the telecommunications industry.

5. The deadline for intervention in this proceeding was January 23, 2006. Because of United's justifiable interest in this proceeding, the fact that the deadline for intervention has passed by only three business days, and the fact that Applicant's testimony has not yet been filed in this proceeding, good cause exists for the Commission to allow this intervention out of time and other parties will not be prejudiced as a result of the Commission granting this request. To minimize any inconvenience to the Commission and the Applicant, United's counsel is hand-delivering this Petition.

6. Correspondence and communications to United with respect to this proceeding should be directed to the undersigned counsel.

WHEREFORE, United Telephone Company of the Carolinas respectfully requests that this honorable Commission permit its intervention in this proceeding as its interests might appear.

Respectfully submitted,

Scott Elliott, Esquire Elliott & Elliott, P.A.

721 Olive Street

Columbia, South Carolina Telephone: 803-771-0555

H. Edward Phillips, Attorney

United Telephone Company of the Carolinas Legal Department Mailstop: NCWKFR0313

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Wake Forest, North Carolina 27587-5900

Telephone: 919-554-7870

North Carolina State Bar No. 30368

Attorneys for United Telephone Company of the Carolinas

January 26, 2006

Columbia, South Carolina

BEFORE

THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

Docket No. 2005-390-C		8		-17
In the matter of:)		3	
Application of Palmetto Utility	,	TICATE OF		
Protection Service, Incorporated for Assignment of the 811 Abbreviated Dialing Code to be Implemented in	•	RVICE	74	1
South Carolina)			
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I, Marcia W. Walters, do hereby certify that I have this date served copies of the foregoing Petition to Intervene Out of Time upon the following parties of record by causing said copy to be deposited with the United States Mail, first class postage prepaid to:

Patrick W. Turner, Counsel BellSouth Telecommunications, Inc. P. O. Box 752 Columbia, SC 29202

Florence P. Belser, General Counsel Office of Regulatory Staff P. O. Box 11263 Columbia, SC 29211

Rhonda Dotman, Application Support Administrator Palmetto Utility Protection Service, Inc. 810 Dutch Square Blvd. Suite 320 Columbia, SC 29210 Margaret M. Fox, Counsel McNair Law Firm, P.A. P. O. Box 11390 Columbia, SC 29211

Nanette S. Edwards, Counsel Office of Regulatory Staff P. O. Box 11263 Columbia, SC 29211

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January 26, 2006

Columbia, South Carolina